UKIGINAL

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FERRY W. WOOFTER

LEGISLATIVE CONSULTANT

FOR EACH MALISZEWSKYJ

DIRECTOR OF ENGINEERING

PRIVATE RADIO

FRITER'S DIRECT DIAL NUMBER 202-828-S 19

Federal Communications Commission 1270 **Fairfield** Road Gettysburg, Pennsylvania **17325-7245**

Re: Mobile Communication Service Company

Dear FCC Staff:

On behalf of Mobile Communication Service Company, we are submitting herewith its Form 602 Wireless Ownership Disclosure Information for the Wireless Telecommunications Services.

Please direct any questions or correspondence regarding this filing to our office

Very truly yours,

Richard D. Rubino

Attorney for Mobile Communication

While D. L.C.

Service Company

2/26/2BSH

Attachment

FEB 2002

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WIE GEG

FCC 602 FCC Main Form RECENED &	Ownership Dis Wireless Tells on INSPECTION	Approved by DMB 306 0 - 0799 See instructions for Publid burden estimate		
Applicant / Licensee Information 1) First Name (if individual): FCC	1 4 2002 MAILROOM	Last Name:	DRIGINAL	Suffix:
Mobile Communication Service, Inc.		Applicant TIN;	3b) FCC Registration Num 0003-1881-33	iber (FRN)
Related FCC Regulated Businesses of Applicant / Lie 4a) Name and address of all FCC Regulated Businesses owned by Applicant/Licensee (use additional sheets, If necessary);	4b) Principal Busine	ess 4c)	FCC Registration Number (FRN).	
NONE				
Signature 5) Typed or Printed Name of Party Authorized to Sign	n		I	I.
First Name	MI	Last Name		Suffix:
Robert	S	Watson	0011112	
Signature.			FEB 2002	Date:
Failure To Sign This Application May Result In Dismiss	alOf The Applicatio	n And Forfeiture Of Any	Fees Paid	775/02

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE EI&&%&OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47. Section 312(a)(I)) AND/OR FORFEITURE (U.S. Code, Title 67, Section 603).

FCC 602 Schedule A

1) Disclosable Interest Holder's First Name (if individual):

FCC Ownership Disclosure Information for the Wireless Telecommunications Services

Schedule for Disclosable Interest Holders

MI:

Last Name:

Approved by OMB 3060 - 0799. See instructions for Public burden estimate

Suffix:

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

Denny		P V	Vatson				
2) Disclosable Interest Holder's Name (if entity):			folder's TIN	: 3b) FCC Registration Number	(FRN):		
ļ			0006-329	 5_10			
4) Disclosable Interest Holder's Address:			0000-327	5-10			
16343 Conneaut Lake Road, Meadvil	lle, Penns	wania 1	6375				
5) Type of Interest in Applicant () (refer to Instructions for list)	6) Disclosable Interest Holder is a (n): () Percent of Interest Held in Applicant (refer to instructions for list of codes):						
0, R, K, D	86.777 (Non-Voting) 74.303 (Voting)						
8) Disclosable interest Holder's Type of Ownership (refer to instructions for list):	8) Disclosable interest Holder's Type of Ownership 9) Disclosable Interest Holder's Country of Citizenship						
С			J .S.A.				
10) Relationship Description (if the disclosable interest h	nolder is an ind	lirect owner. lis	st path of ownership from	indirect owner to the applicant):			
Related FCC Regulated Businesses of Disclosable In	nterest Holde	rs (repeat for	each interest holder id	dentified)			
IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):		b) Business:	IIc) TIN:	11d) FCC Registration Number (FRN):	IIe) Percent of Interest Held		
None							
					1		

FCC 602 Schedule A

FCC Ownership Disclosure Information for the Wireless Telecommunications Services

Schedule for Disclosable Interest Holders

Approved by OMB 3060 - 0799 See instructions for **Public** burden estimate

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individu	ıal).	MI: L	ast Name.			Suffix
2) Disclosable Interest Holder's Name (if entity):		3a) Disclos	able Interest Holder's TIN	: 3b) FCC Regis	stration Number	(FRN):
Estate of Martha L. Watson				0006-3295	5-51	
4) Disclosable Interest Holder's Address:		and the second				
16343 Conneaut Lake Road, Meady	ille, Penns	ylvania 1	.6335			
5) Type of Interest In Applicant () (refer to instructions for list)	6) Disclosable (refer to inst	Interest Holdeructions for li	er is a (n): () st of codes):	7) Percent of Intere	st Held in Applica	ant
D	0 - Other	(Estate)		13.0 (Voting)	ı	
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):			9) Disclosable Interest Ho			
C		1	U.S.A.			
10) Relationship Description (if the disclosable Interest	holder is an inc	direct owner,	ist path of ownership from	n indirect owner to th	e applicant):	
Related FCC Regulated Businesses of Disclosable	Interest Holde	rs (repeat fo	r each interest holder i	dentified)		
IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed In #3 (use additional sheets, if necessary).	11 Principal	b) Business	IIc) TIN:	IId FCC Regi Number	stration	IIe) Percent of Interest Held.
None						
			 			
		-				

FCC 602 Schedule A

FCC Ownership Disclosure Information for the Wireless Telecommunications Services

Schedule for Disclosable Interest Holders

Approved by OMB 3060 - 0799 See instructions for Publid burden estimate

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	Disclosable Interest Holder's First Name (if individual): Robert		MI:	Last Name:			Suffixi	
2) Disclosable Interest Holder's Name (if entii): 3a) Disclosable Interest Holder's TIN: 4) Disclosable Interest Holder's Address: 16343 Conneaut Lake Road, Meadville, Pennsylvania 16335 5) Type of Interest in Applicant (S					
4) Disclosable Interest Holder's Address: 16343 Conneaut Lake Road, Meadville, Pennsylvania 16335 5) Type of Interest in Applicant () (refer to instructions for list) (refer to instructions for list of codes): 13.223 (Non-Voting) 12.694 (Voting) 6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): 9) Disclosable Interest Holder's Country of Citizenship: C U.S.A. 10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): 11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None					3b) FCC	Registration Number	(FRN):	
4) Disclosable Interest Holder's Address: 16343 Conneaut Lake Road, Meadville, Pennsylvania 16335 5) Type of Interest in Applicant () (refer to instructions for list) (refer to instructions for list of codes): 13.223 (Non-Voting) 12.694 (Voting) 6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): 9) Disclosable Interest Holder's Country of Citizenship: C U.S.A. 10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): 11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None					0006-3	296-o 1		
5) Type of Interest in Applicant () (refer to instructions for list) 6) Disclosāble Interest Holder is a (n): () (refer to instructions for list of codes): 13.223 (Nion-Voting) 12.694 (Voting) 10. R. K. D 1	4) Disclosable Interest Holder's Address:		H.		0000 2	270 0 1		
(refer to instructions for list) (refer to instructions for list of codes): 13.223 (Non-Voting) 12.694 (Voting) 6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): (refer to instructions for list): (Interest Holder's Country of Citizenship: (Inter	16343 Conneaut Lake Road, Meady	ville, Penns	sylvania	16335				
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): 9) Disclosable Interest Holder's Country of Citizenship: U.S.A. 10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): telated FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified) IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None					7) Percent of Interest Held in Applicant			
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): 9) Disclosable Interest Holder's Country of Citizenship: U.S.A. 10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): telated FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified) IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None		T	13.223 (Non-Vo			on-Voting)		
U.S.A. 10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): 11a) Same and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): 11b) Silc)	6) Disclosable Interest Holder's Type of Ownership	1		9) Disclosable Interest Ho				
Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified) IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None	(refer to instructions for list):							
Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified) IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None	C			II S A				
Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None	10) Relationship Description (if the disclosable interest	t holder is an inc	direct owner		n indirect owner	to the applicant):		
Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None								
Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None								
Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): None Principal Business: TIN: FCC Registration Number (FRN): Interest Held Interest Held	Related FCC Regulated Businesses of Disclosable	Interest Holde	ers (repeat	for each interest holder i	dentified)			
	Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use	Principal				Registration	IIe) Percent of Interest Held	
	None							
				+	+			
							v	
		-						

Exhibit 1 FCC Form 602 Page 1 of 1

Mobile Communication Service Company (MCSC) hereby requests a waiver of Sections 1.919(b) and 1.2107(f) of the Commission's Rules, 47 C.F.R. §§ 1.919(b), 1.2107(f) (200 1) to permit the late filing of its Form 602 Ownership Disclosure Information for the Wireless **Telecommunications** Services.

MCSC was a participant in the Commission's Lower and Upper Bands Paging Auction (Auction Event No. 40). At the time that the Form 601 Long-Form application was due, MCSC believed that it already had a current Form 602 on file with the Commission. This belief was based upon its completion and return of a Form 602 Ouestionnaire to counsel in connection with a proposed transaction involving another carrier. Because the transaction ultimately did not involve an assignment of an FCC radio license, the filing of the Form 602 was not required. As a result, MCSC did not realize that the Form 602 had never been filed. Upon learning that it apparently did not have a Form 602 on file with the Commission, MCSC immediately requested that counsel prepare a new Form 602. In preparing the Form 602, MCSC also determined that certain minor changes in ownership structure had occurred since the filing of the Form 601 long-form application. Specifically, on December 27, 2001, Martha L. Watson (mother of Denny P. Watson and grandmother of Robert S. Watson) passed away and (b) Denny P. Watson transferred a small amount of stock to his son, Robert S. Watson, which transfer gave Robert S. Watson a 12.694 percent voting interest and a 13.223 nonvoting interest in MCSC. Neither of these events triggered a transfer of control of MCSC in that, at all times, Denny P. Watson has maintained a greater than 50 ownership interest in MCSC.

MCSC notes that the late-filing of its Form 602 has not prejudiced the Commission's determination of its ownership qualifications since, but for subsequent events, the substantive ownership information contained in the Form 602 is fully contained with its Form 601 long-form application. A review of MCSC's pending Form 601 long-form application reflects that MCSC fully disclosed its ownership information in Exhibit A as of the time of filing.' At no time did MCSC withhold its ownership information from the Commission. Rather, the late-filing of the Form 602 is the result of an inadvertent misunderstanding of documents that were already on file with the Commission.

MCSC submits that a grant of the instant waiver is in the public interest. MCSC is in a position to expand its facilities and bring service to its customers in rural Pennsylvania. Because of the overall light demand for paging spectrum in Auction 40, MCSC fears that a denial of the instant waiver request will delay, for an indefinite period of time, the expansion of paging services to the public.

¹ MCSC is now in the process of preparing a minor amendment to its Form 601 long-form application to reflect the minor changes in stock ownership as described above.